

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Lynette Caprice Shadding, Debtor ----- Delaware County Tax Claim Bureau, Movant vs. Lynette Caprice Shadding, Respondent and Kenneth E. West, Trustee	Chapter 13 Case No. 22-12536-amc
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**RESPONSE IN OPPOSITION TO MOTION OF THE DELAWARE
COUNTY TAX CLAIM BUREAU FOR RELIEF FROM THE AUTOMATIC
STAY**

AND NOW comes Respondent, Lynette Caprice Shadding, Debtor, by and through her counsel, Dean Lintzeris Law and Dean Lintzeris, Esquire, filing her Opposition to Motion of the Delaware County Tax Claim Bureau for Relief from the Automatic Stay and hereby avers:

1. Admitted upon information and belief.
2. Admitted.
3. Admitted.
4. Admitted.

5. Admitted in part, denied in part. Exhibit B accurately reflects the taxes for 2023. However, Respondent did not receive notice of the amounts due.
6. Denied. Paragraph 6 constitutes a conclusion of law to which no response is required.
7. Denied. Paragraph 7 constitutes a conclusion of law to which no response is required.
8. Denied. Paragraph 8 contains a constitutes of law to which no response is required.
9. Denied. Paragraph 9 constitutes a conclusion of law to which to response is required.
10. Denied. Respondent demands strict proof at trial as to any delinquencies due and owing.
11. Denied. Paragraph 11 constitutes a conclusion of law to which no response is required.
12. Denied. Movant's assertion that Respondent has made "no provision for the payment of ongoing real estate taxes" has no basis in fact and demands strict proof thereof at trial.
13. Denied. No response required.

WHEREFORE, Respondent, Lynette Captrice Shadding, Debtor, respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay in its entirety.

Respectfully submitted,

DATED: April 15, 2024

DEAN LINTZERIS LAW

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